

Marc E. Kasowitz (mkasowitz@kasowitz.com)
Hector Torres (htorres@kasowitz.com)
Michael S. Shuster (mshuster@kasowitz.com)
Christopher P. Johnson (cjohnson@kasowitz.com)
Charles M. Miller (cmiller@kasowitz.com)
Michael A. Hanin (mhanin@kasowitz.com)
Kanchana Wangkeo Leung (kleung@kasowitz.com)

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
1633 Broadway
New York, New York 10019
Tel: (212) 506-1700

Attorneys for Plaintiff Federal Housing Finance Agency

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL HOUSING FINANCE AGENCY,
AS CONSERVATOR FOR THE FEDERAL
HOME LOAN MORTGAGE
CORPORATION,

11 Civ. 7048 (VM)

Plaintiff,

-against-

GENERAL ELECTRIC COMPANY,
GENERAL ELECTRIC CAPITAL
SERVICES, INC. d/b/a GE CONSUMER
FINANCE or GE MONEY, GE MORTGAGE
HOLDING, L.L.C., GE-WMC SECURITIES,
L.L.C., MORGAN STANLEY & CO., INC.,
and CREDIT SUISSE SECURITIES (USA)
LLC f/k/a CREDIT SUISSE FIRST BOSTON
LLC,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, Plaintiff Federal Housing Finance Agency, by and through its undersigned attorneys, moves this Court before the Honorable Victor Marrero, United States District Court Judge, United States District

Court, Southern District of New York, for an order, pursuant to 28 U.S.C. § 1447(c): (i) remanding this removed action to the Supreme Court of the State of New York, New York County, and (ii) awarding Plaintiff the attorneys' fees, costs and expenses it incurred as a result of this removal.

DATED: New York, New York
 November 7, 2011

KASOWITZ, BENSON, TORRES
& FRIEDMAN LLP

By: /s/ Marc E. Kasowitz

Marc E. Kasowitz (mkasowitz@kasowitz.com)
Hector Torres (htorres@kasowitz.com)
Michael S. Shuster (mshuster@kasowitz.com)
Christopher P. Johnson (cjohnson@kasowitz.com)
Charles M. Miller (cmiller@kasowitz.com)
Michael A. Hanin (mhanin@kasowitz.com)
Kanchana Wangkeo Leung (kleung@kasowitz.com)

1633 Broadway
New York, New York 10019
(212) 506-1700

Attorneys for Plaintiff Federal Housing Finance Agency, as Conservator for the Federal Home Loan Mortgage Corporation

TO: Greg A. Danilow (greg.danilow@weil.com)
Vernon S. Broderick (vernon.broderick@weil.com)
Weil, Gotshal & Manges LLP
767 Fifth Avenue, 25th Floor
New York, New York 10153
(212) 310-8000
Attorneys for Defendants

James P. Rouhandeh (james.rouhandeh@dpw.com)
Brian S. Weinstein (brian.weinstein@dpw.com)
Daniel Jacob Schwartz (daniel.schwartz@dpw.com)
Nicholas N. George (nicholas.george@davispolk.com)
Jane M. Morril (jane.morril@dpw.com)
Davis Polk & Wardwell L.L.P.
450 Lexington Avenue
New York, New York 10017
(212) 450-4000
Attorneys for Defendants

Michael T. Reynolds (mreynolds@cravath.com)
Richard W. Clary (rclary@cravath.com)
Cravath, Swaine & Moore LLP
825 Eighth Avenue
New York, New York 10019
(212) 474-1000
Attorneys for Defendants